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Attorneys for Plaintiffs-Intervenors  
ANDREW QUAN, NICHOLAS JONES, and  
ELIZABETH HENNESSEY-SEVERSON

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

THE DEPARTMENT OF FAIR  
EMPLOYMENT AND HOUSING,

Plaintiff,

v.

LAW SCHOOL ADMISSION COUNCIL,  
INC., *ET AL.*,

Defendants.

JOHN DOE, JANE DOE, PETER ROE,  
RAYMOND BANKS, KEVIN COLLINS,  
RODNEY DECOMO-SCHMITT, ANDREW  
GROSSMAN, ELIZABETH HENNESSEY-  
SEVERSON, OTILIA IOAN, ALEX  
JOHNSON, NICHOLAS JONES, CAROLINE  
LEE, ANDREW QUAN, STEPHEN SEMOS,  
GAZELLE TALESHPOUR, KEVIN  
VIELBAUM, AUSTIN WHITNEY, and all  
other similarly situated individuals,

Real Parties in Interest

**Case No. CV 12-1830-EMC**

**DECLARATION OF CLAUDIA  
CENTER IN SUPPORT OF MOTION  
TO INTERVENE**

DATE: September 7, 2012

TIME: 1:30 p.m.

LOCATION: Courtroom 5, 17th Floor  
San Francisco, CA 94102

The Honorable Edward M. Chen

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2 I, CLAUDIA CENTER, declare as follows:

3 1. I am an attorney at law licensed to practice in the State of California and before  
4 this Court, and am one of the attorneys representing Mr. Andrew QUAN, Mr. Nicholas JONES,  
5 and Ms. Elizabeth HENNESSEY-SEVERSON. I submit this Declaration in Support of the  
6 Motion to Intervene in the above-captioned matter.

7 2. I have personal knowledge of the facts set forth in this declaration and am  
8 competent to testify to them.

9 3. Attached hereto as Exhibit A is a true and correct copy of the Complaint in  
10 Intervention that Mr. QUAN, Mr. JONES, and Ms. HENNESSEY-SEVERSON request  
11 permission to file.

12 4. On or about February 6, 2012, California's Department of Fair Employment and  
13 Housing (DFEH) issued an "accusation" against Defendant LAW SCHOOL ADMISSION  
14 COUNCIL (LSAC) before the Fair Employment and Housing Commission, alleging violations of  
15 the Unruh Civil Rights Act, Cal. Civ. Code § 51 *et seq.* Among the real parties in interest are  
16 Andrew Quan (QUAN), Nicolas Jones (JONES), and Elizabeth Hennessey-Severson  
17 (HENNESSEY-SEVERSON), the moving parties herein. The Complaint in this Court was  
18 based in part on the timely charges of discrimination that Mr. QUAN, Mr. JONES, and Ms.  
19 HENNESSEY-SEVERSON filed with that agency. Thereafter, the Defendant LSAC elected to  
20 transfer the proceedings to court instead of having the matter decided by the Commission. On or  
21 about March 15, 2012, the DFEH filed a complaint in the Superior Court for the State of  
22 California, County of Alameda. On or about April 12, 2012, Defendant LSAC removed the case  
23 to this Court.

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2 I declare under penalty of the laws of the United States of America and the State of  
3 California that the foregoing is true and correct, and that this declaration was executed in San  
4 Francisco, California, on July 27, 2012.

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6 By: /s/ Claudia Center  
7 CLAUDIA CENTER  
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